

1 LAWRENCE A. ORGAN (SBN 175503)
2 NAVRUZ AVLONI (SBN 279556)
3 CIMONE A. NUNLEY (SBN 362915)
4 **CALIFORNIA CIVIL RIGHTS LAW GROUP**
5 332 San Anselmo Ave.
6 San Anselmo, California, 94960
7 Telephone: (415) 453-4740
8 Facsimile: (415) 785-7352
9 larry@civilrightsca.com
10 navruz@civilrightsca.com

11 J. BERNARD ALEXANDER (SBN 128307)
12 **ALEXANDER KRAKOW + GLICK LLP**
13 1900 Avenue of the Stars, Suite 900
14 Los Angeles, California 90067
15 Telephone: (310) 394-0888
16 Facsimile: (310) 394-0811
17 balexander@akgllp.com

18 Attorneys for Plaintiffs
19 DEMETRIC DI-AZ and OWEN DIAZ

20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

DECLARATION OF NIGEL JONES

1 I, NIGEL JONES, hereby declare:

2 1. I am over the age of 18. If called upon to testify, I could and would testify
3 competently as to the facts set forth in this declaration.

4 2. I am a Black man. I was employed by Tesla, Inc. ("Tesla") at the factory in
5 Fremont, California from approximately September 2015 to February 2018. I was hired through
6 Chartwell Staffing. I began working as a Battery Technician and was promoted to Fleet
7 Coordinator after approximately six months. In June of 2017, I was promoted to Mobile
8 Equipment Maintenance Supervisor, at that time I became a permanent employee of Tesla.

9 3. My former supervisor, Andrei Stsiapanau told me and two Black employees,
10 "You people are lazy and you don't know how to do anything right, fucking niggers" in
11 approximately January 2018.

12 4. I heard the n-word multiple times a day through the factory, both the -a and -er
13 versions of the word throughout my employment at Tesla.

14 5. I recall seeing the n-word and swastikas drawn on bathroom stalls in
15 approximately January 2018.

16 6. My position required me to work in the elevators very often. I worked in both
17 recycling centers often, as well. I recall hearing the n-word in that part of the factory.

18 7. Ramon Martinez and Michael Wheeler are familiar to me as other Chartwell
19 employees. Troy Dennis and Jesse Leite sound familiar to me, as well.

20 8. I remember Edward Romero as a supervisor in either the elevators or recycling
21 center. I remember Victor Quintero as a manger.

22 9. I know Wayne Jackson through his position with nextSource in the Tesla factory.
23 I often went into the office he worked in to complain about racial harassment. Although I do not
24

1 recall complaining directly to him, I remember he was present when I complained to other
2 employees in the office.

3 10. I know Josue Torres through his position in the recycling center. We helped each
4 other with work, and he would recommend his employees to call me if they needed help. We
5 discussed the racial harassment we observed throughout the factory.
6

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct. Executed on April 24, 2020 in Escalon, California.
9

10 By: 
11 _____
12 Nigel Jones
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28